

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,
Plaintiff,

No. CV-22-08196-PCT-MTL

vs.

DECLARATION OF

Lions of Liberty LLC; Yavapai County
Preparedness Team; Jim Arroyo, Lucas
Cilano; Nicholas Cilano; Brian Mounsey;
Toby Fox; Bruce Mounsey; James Johnson;
Melody Jennings; Clean Elections USA;
John Does 1-10,

Defendants.

I, [REDACTED], declare as follows:

1. I am a [REDACTED]-year-old man who [REDACTED]. My wife and I live in Mesa, Maricopa County, Arizona.
2. I believe that voting is my civic duty. Therefore, on Monday evening, October 17, 2022, my wife and I filled out our ballots together and decided that we would drop them off at a drop box.
3. We drove to the drop box at Mesa City Hall, but it was closed when we arrived. We looked online and found out that the drop box outside of the Maricopa Juvenile Court in Mesa was open and only a couple of miles away. We drove to that drop box and arrived at approximately 6:40 PM.
4. When we arrived, there was a group of six to nine men and women in the parking lot, just south of the drop box. Some were sitting in camping chairs and others were standing nearby the chairs. They were facing the drop box, watching voters drop off their ballots.
5. Some of these individuals by the camping chairs were holding up their iPhones and others were holding tripods—some with iPhones attached to the tripods.

1 One person had a very large camera. These people were clearly filming and
2 photographing voters; I saw the flashes of their cameras.

3 6. When my wife saw these individuals, she was fearful of them taking pictures and
4 she wanted to leave right away without voting.

5 7. It was troubling to me that these individuals caused my wife to be too scared to
6 vote, so I insisted that I would get out of the car and drop off both of our ballots
7 while she stayed inside.

8 8. My wife told me she was worried that the people would be able to zoom in on
9 our ballots and see our phone numbers and then harass us. In response to this
10 concern, I put our two ballots under my shirt and got out of the car.

11 9. As I got out of the car, four of the people by the camping chairs started following
12 me with their cameras and taking pictures of me. They came well within 75-feet
13 of the drop box. They were closer to 30-feet from the drop box.

14 10. Two of the people from the camping chairs asked me if I was a mule. I
15 responded that I was not.

16 11. One person then walked across the street to take a picture of our license plate.

17 12. One person said that they were there "hunting mules."

18 13. I was frustrated that these individuals were accusing me of doing something
19 illegal when I was simply carrying out my duty to vote. I finally made a crude
20 gesture and a crude remark to them.

21 14. I then got back into the car. Because our car was facing these individuals and I
22 did not want to drive passed them, I pulled away from the drop box in reverse
23 and from there, drove onto the main road.

24 15. As we were pulling out of the lot, I saw one of the individuals get into a white
25 SUV. That person pulled out of the parking lot from a different exit than we
26 used and drove behind us on the main road. The person tried to photograph our
27 license plate while we were driving away.

1 16. My wife and I were very upset by this interaction, and my wife was very fearful.
2 I immediately tried to call a toll free number that I found online for Arizona
3 voters, but it was not working, so I went on the Secretary of State's website and
4 filed a complaint. Attached as **Exhibit A** is the complaint that I filed with the
5 Secretary of State.

6 17. Although I never spoke to the media about what happened, the media got ahold
7 of my complaint, and then got ahold of a surveillance video showing this
8 interaction. News organizations then published stories about the incident.
9 Attached as **Exhibit B** is a web link to one such story, featuring the surveillance
10 video of the interaction. Attached as **Exhibit C** is a Twitter post by the journalist
11 who obtained the surveillance video.

12 18. Since the incident, a person named Melody Jennings who appears to be
13 associated with Clean Elections USA and another person Alice Bagley Mercer
14 posted on social media regarding the incident. Attached as **Exhibits D, E, and F**
15 are social media posts from these individuals, in which they take credit for
16 identifying me as a "mule" but deny that people from Clean Elections USA
17 interacted with me.

18 19. I asked for my name to be redacted from this declaration because I am scared
19 that otherwise the individuals who tried to intimidate me from voting will
20 disparage me by name, harass me personally, and threaten my safety, especially
21 considering their social media posts.

22
23 I declare under penalty of perjury that the foregoing Declaration is true and correct.

24
25 Executed on October 28, 2022.

26 s/ [REDACTED]
[REDACTED] [REDACTED]
27
28

EXHIBIT A

Fwd: Webform: Voting Incident 240

Christine Dyster <cdyster@azsos.gov>

Mon 10/17/2022 8:12 PM

To: Scott Jarrett <sjarrett@risc.maricopa.gov>; Rey Valenzuela - RISCX <rvalenzuela@risc.maricopa.gov>; Melissa Davis - RISCX <mdavis@risc.maricopa.gov>; Michael Moore - RISCX <mmoore@risc.maricopa.gov>

Cc: Kori Lorick <KLorick@azsos.gov>; Angie Cloutier <acloutier@azsos.gov>; Jason Chavez <jchavez@azsos.gov>

For your awareness- the following was reported to our office.

Get [Outlook for iOS](#)

From: webmaster@azsos.gov <webmaster@azsos.gov> on behalf of [REDACTED] via Arizona Secretary of State <webmaster@azsos.gov>

Sent: Monday, October 17, 2022 7:28:58 PM

To: Christine Dyster <cdyster@azsos.gov>

Subject: Webform: Voting Incident - -240

CAUTION: The following message contains information provided by an anonymous user through an online webform. Please treat the below message with caution, avoid clicking links, downloading attachments, or replying with personal information.

Submitted values are:

==Incident==

Date of incident: Mon, 10/17/2022

Approximate time of the incident: 6:40 pm

County where incident occurred: Maricopa

Polling location where incident occurred: Mesa juvenile court drop box

Describe the incident: There's a group of people hanging out near the ballot dropbox filming and photographing my wife and I as we approached the dropbox and accusing us of being a mule. They took a photographs of our license plate and of us and then followed us out the parking lot in one of their cars continuing to film.

Were you able to report this incident to the poll workers or county officials?

Current status of the incident: Ongoing

Files: No, I don't have any additional information.

==Contact Info==

Full Name: [REDACTED]

Email: [REDACTED]

Phone Number: [REDACTED]

EXHIBIT B

ABC15.Com Staff, *Intimidation Complaint Claims Voter was Filmed, Accused of Being 'Mule' at Mesa Dropbox*, ABC15, Oct. 20, 2022,
<https://www.abc15.com/news/political/elections/intimidation-complaint-claims-voter-was-filmed-accused-of-being-mule-at-mesa-dropbox> (last visited Oct. 28, 2022).

EXHIBIT C

1:28

5G

**The AZ - abc15 - Dat...**
40.1K Tweets**Tweets****Tweets & replies****Media****Likes****The AZ - abc15 - Data...** · 5dReplying to [@Garrett_Archer](#)**Update: we have obtained the security footage.**[twitter.com/Garrett_Archer...](#)**The AZ - abc15 - D...** · 5d

DEVELOPING: @abc15 has obtained the security footage of alleged voter intimidation at Mesa drop box. Full video is 20 minutes long, we have edited it and blurred the voter. There's no audio on original video, but voter claims he was photographed and accused of being a mule.

[Show this thread](#)

EXHIBIT D



Alice Bagley Mercer is with **Gail Golec** and **8 others**.

2d · 🌐

Mule hunting tonight.

This is a mule driving up to the outdoor Dropbox. He proceeded to get out, hide his stack of ballots and talk smack to us. Then proceeded to back up so we couldn't take a picture of his license plate. YES! 2,000 mules was real! We regrouped and put a person at all angles now. Disgusting how our elections are corrupt!

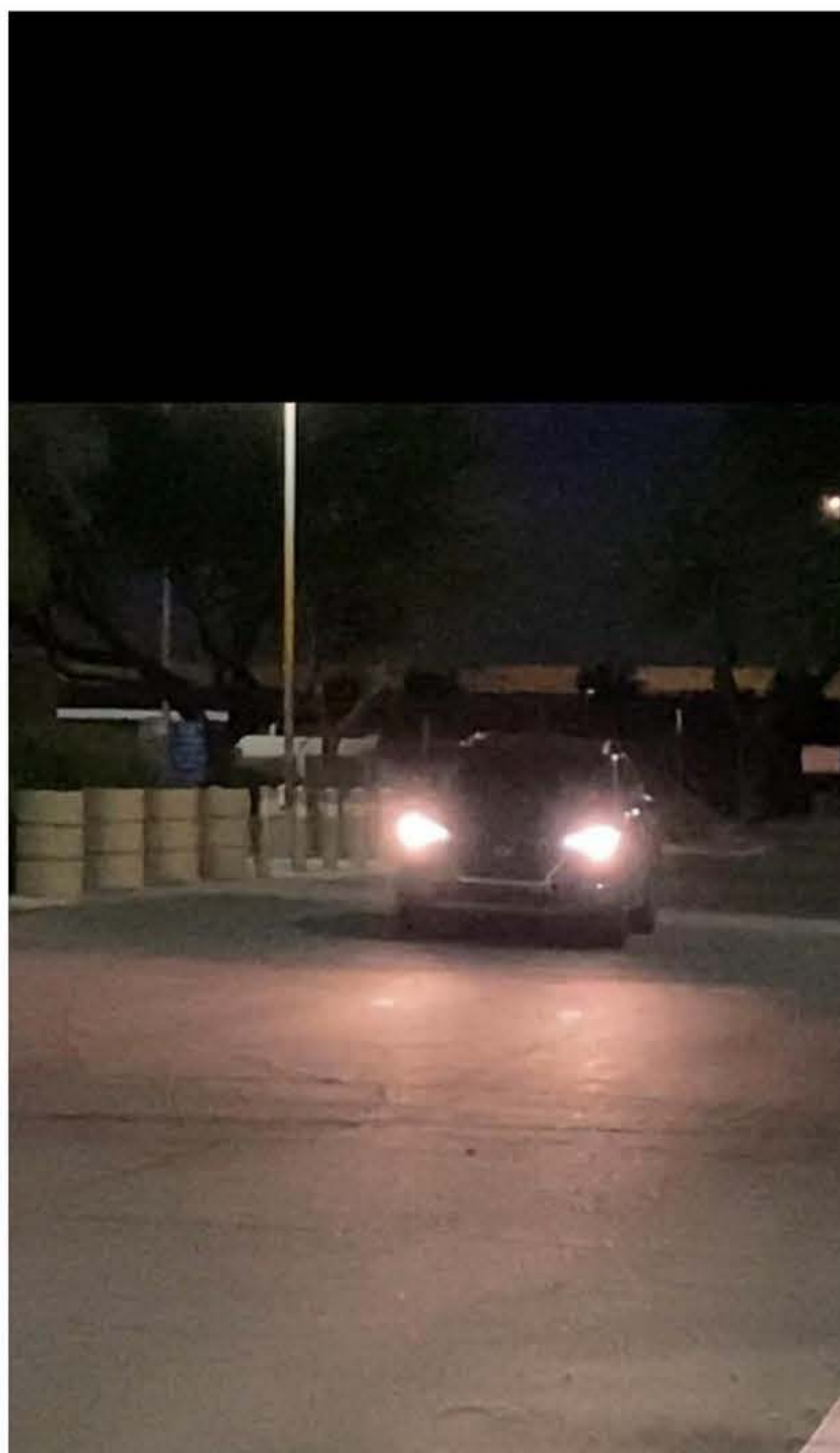


EXHIBIT E



Case 3:22-cv-08196-MTL Document 11-2 Filed 10/28/22 Page 14 of 16

TrumperMel ✓

@TrumperMel · 2d

This guy. Drove in backwards to avoid plate detection. Got out showing his back. Pulled ballots out of his shirt. I need people there tonight to help my people. Lots of you! 75 ft away from box, post up opposite so we see both sides. Someone get tags. No talking to them. Do NOT GO INSIDE 75 ft! They are trying to get us to engage them. Do not do it!

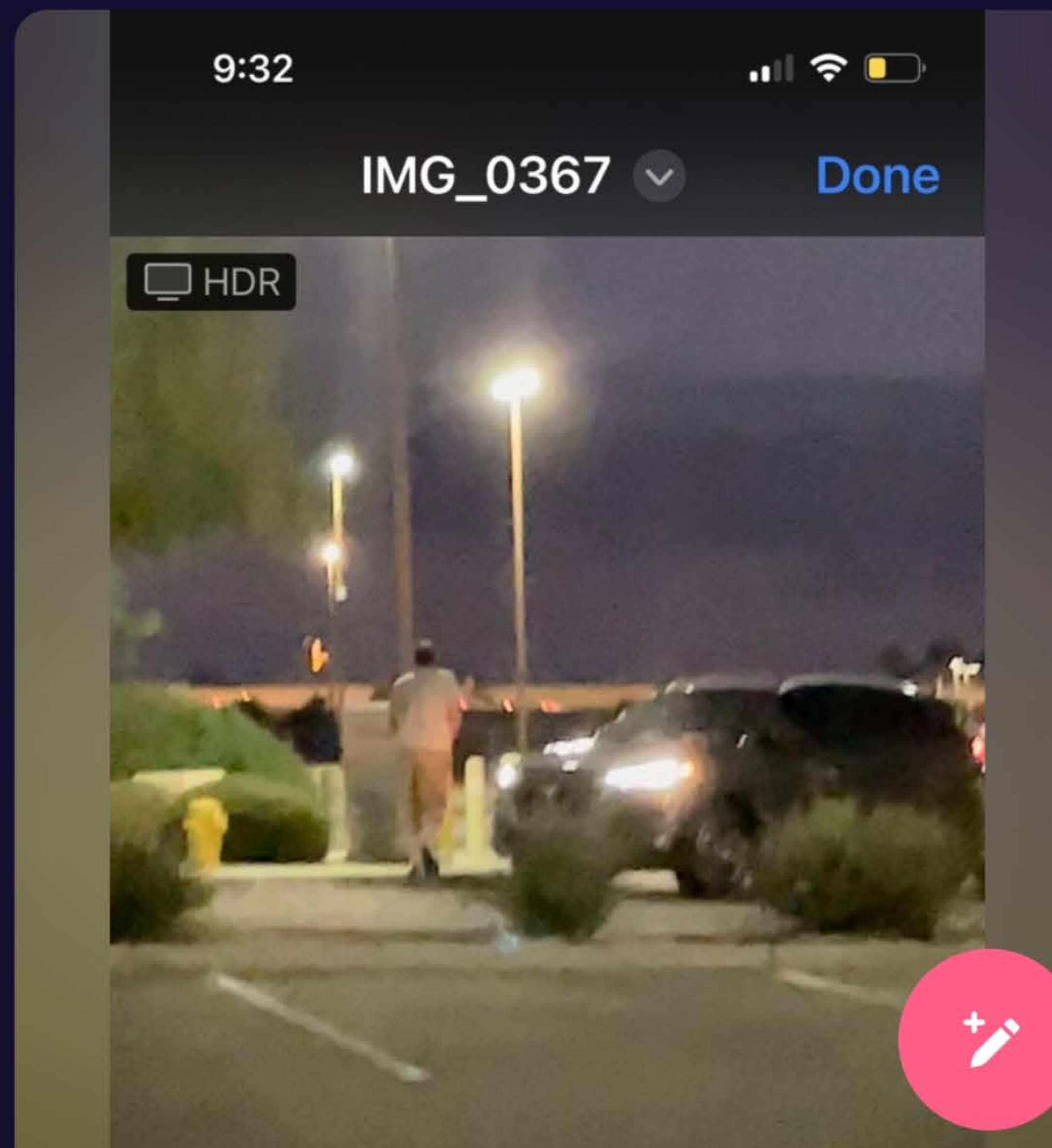


EXHIBIT F

**TrumperMel**

@TrumperMel · 11h

Public statement. On Monday night a man drove up to a drop box in Maricopa County. He asked people sitting outside the 75 ft perimeter where the drop box was. Another individual not associated with Clean Elections USA who was there on his own responded to this individual. At no time did anyone from Clean Clean Elections USA interact with this person who drove up to the box.

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Tweet your reply